



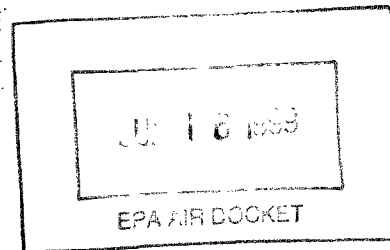
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
RESEARCH TRIANGLE PARK, NC 27711

James
A-99-03
II-C-1

April 21, 1999

OFFICE OF
AIR QUALITY PLANNING
AND STANDARDS

Ms. Courtney M. Price
Vice President, CHEMSTAR
Chemical Manufacturers Association Ketones Panel
1300 Wilson Blvd.
Arlington, VA 22209



Dear Ms. Price:

We have concluded an initial review of the Chemical Manufacturers Association (CMA) Ketones Panel's petition to delist methyl ethyl ketone from the list of hazardous air pollutants (HAPs) contained under Section 112(b)(1) of the 1990 Clean Air Act (Act). Based on the original petition and supplemental materials provided through August 31, 1998, the Environmental Protection Agency (EPA) finds CMA's petition to be complete and ready for the technical review phase of the delisting process. (Hereafter, the term "petition" will refer to the initial November 27, 1996 submittal and the supplemental materials as listed in enclosure 1.)

The EPA Administrator is required under Section 112(b)(3)(A) of the Act to either grant or deny a petition to delist a specific HAP within 18 months of its receipt. For the purpose of CMA's petition, we consider the start of this 18 month time period to be August 31, 1998, the date of the last submittal which completed the petition. As a next step, we will proceed to publish a "Notice of Receipt of a Complete Petition" in the Federal Register and invite public comment on the substance of the petition. Concurrent with public comment, we will initiate a comprehensive technical review of the petition to determine whether it satisfies the requirements of Section 112(b)(3)(C) of the Act. Our review will include, as it comes available, any pertinent information or data received from the public.

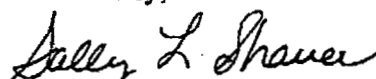
If our final analysis supports the petition, we will publish in the Federal Register, prior to the expiration of the 18 months' time period, a notice of a proposed rule to modify the Section 112(b)(1) HAPs list. The subsequent development of a final rule to delist methyl ethyl ketone will be subject to the Agency's standard regulatory development and review process and may extend beyond the 18 months time period. If, however, the petition is denied, a Federal Register notice that sets forth an explanation of the reasons for the denial shall be published instead. A notice of denial shall constitute a final Agency action, and is subject to judicial review as provided in Section 307(b) of the Act.

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We must complete our review expeditiously to meet the time constraint established by the Act. However, it is possible that during this phase of our review one or more substantive technical issues will arise for which we might request further clarification. Should such a situation occur, we will contact you, describe the issue, and provide an opportunity for CMA to supply additional information or analysis.

If you have questions concerning this letter, please feel free to contact me at 919-541-5572 or James B. White (Project Manager) at 919-541-0842.

Sincerely,



Sally L. Shaver

Director

Emission Standards Division

Enclosures

cc: Mr. William K. Rawson, Latham & Watkins
Timothy Backstrom (MC-2344)
Charles French (MD-13)
Karen M. Martin (MD-13)
Robert Perciasepe (MC-6101)
John Seitz (MD-10)
James White (MD-13)

Administrative Record for Methyl Ethyl Ketone (MEK) Deletion Petition

Item	Title/Description	Preparer/Petitioner	Date
1	Cover Letter	CMA Ketones Panel	November 25, 1996
2	Petition of the Chemical Manufacturers Association Ketones Panel to Remove Methyl Ethyl Ketone from the List of Hazardous Air Pollutants Under Section 112(b) of the Clean Air Act	CMA Ketones Panel	November 27, 1996
3	Petition of the Chemical Manufacturers Association Ketones Panel to Remove Methyl Ethyl Ketone from the List of Hazardous Air Pollutants Under Section 112(b) of the Clean Air Act - Volume I of IV (Appendices A through J)	CMA Ketones Panel	November 27, 1996
4	Petition of the Chemical Manufacturers Association Ketones Panel to Remove Methyl Ethyl Ketone from the List of Hazardous Air Pollutants Under Section 112(b) of the Clean Air Act - Volume II of IV (Appendices K-1 through K-25)	CMA Ketones Panel	November 27, 1996
5	Petition of the Chemical Manufacturers Association Ketones Panel to Remove Methyl Ethyl Ketone from the List of Hazardous Air Pollutants Under Section 112(b) of the Clean Air Act - Volume III of IV (Appendices K-26 through K-40)	CMA Ketones Panel	November 27, 1996
6	Petition of the Chemical Manufacturers Association Ketones Panel to Remove Methyl Ethyl Ketone from the List of Hazardous Air Pollutants Under Section 112(b) of the Clean Air Act - Volume IV of IV (Appendices K-41 through K-57)	CMA Ketones Panel	November 27, 1996

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**Administrative Record for Methyl Ethyl Ketone (MEK) Deletion Petition
(continued)**

Item	Title/Description	Preparer/Petitioner	Date
7	Petition of the Chemical Manufacturers Association Ketones Panel to Delist Methyl Ethyl Ketone Under Section 313 of the Emergency Planning and Community Right-to-Know Act of 1986	CMA Ketones Panel	November 27, 1996
8	Report entitled Chemistry Report on Methyl Ethyl Ketone EPCRA Section 313 Delisting Petition, prepared by Jenny Tou, Industrial Chemistry Branch, Economics, Exposure, and Technology Division, Office of Pollution Prevention and Toxics	EPA	March 10, 1997
9	Source Information for Major MEK emitters	ENSR for EPA	September 15, 1997
10	Memorandum for Kelly Rimer (EPA) from Lisa Sutton (EC/R) - Preliminary Completeness Review for MEK Petition	EC/R for EPA	September 26, 1997
11	E-mail message to Kelly Rimer (EPA) from Deborah Amaral (EC/R) - Draft Ecological Review of the Petition to Delete Methyl Ethyl Ketone or Its Pertinent Emissions Under §112 of the Clean Air Act	EC/R and Cadmus for EPA	March 5, 1998
12	Letter to Kelly Rimer (EPA) from David W. Heinold (ENSR) - MEK Modeling Data in Support of CMA CAA Delisting Petition.	ENSR for CMA	June 17, 1998
13	Memorandum to James White (EPA) from David W. Heinold (ENSR) - MEK Modeling Data in Support of CMA CAA Delisting Petition.	ENSR for CMA for EPA	July 15, 1998

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Administrative Record for Methyl Ethyl Ketone (MEK) Deletion Petition
(continued)

Item	Title/Description	Preparer/Petitioner	Date
14	Letter to James White (EPA) from Courtney Price (CHEMSTAR) - Addendum to MEK Delisting Petition Includes Letter, Addendum to Petition to Remove MEK from the HAP List (August 31, 1998), Supplemental Report on Air Dispersion Modeling of MEK Emissions (prepared by ENSR, August 1988), Distribution of MEK emission across reporting ranges, and Modeling the Environmental Fate of Methyl Ethyl Ketone (prepared by Manuel L. Cano, Shell Chemical Co., August 26, 1998)	CHEMSTAR for CMA	August 31, 1998

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